

STAACK, SIMMS & HERNANDEZ, P.A.

Attorneys At Law

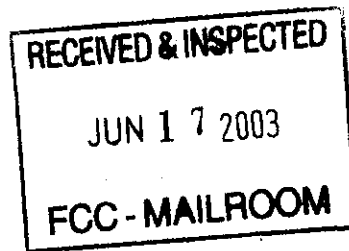
GINGER ANN DEGROFF
ALEXANDER HERNANDEZ
CAMERON D. MOYER
KALINA SARMOV
JOHN S. SIMMS
JAMES A. STAACK *

*Bar Certified Attorney: Real Estate

900 DREW STREET
SUITE 1
CLEARWATER, FL 33755

CLEARWATER: (727) 441-2635
TAMPA: (813) 920-9882
FAX: (727) 461-4836
E-Mail: attorneys@Staack-firm.com
Website: www.staack-firm.com

toll free: 1-(800)-474-9935



June 12, 2003

Federal Communications Commission
Attn: Calvin Osborne, General Counsel
Consumer and Governmental Affairs Bureau
445 - 12th Street S. W.
Washington, DC 20554

Re: In the matter of Linda Thorpe vs. GTE Corporation, et al.
CG Docket No. 03-84

Dear Mr. Osborne:

Enclosed herewith please find Plaintiff/Petitioner's Motion for Extension of Time to File A Reply to Comments Untimely Filed in the above referenced case. Due to the fact the two Comments were submitted and filed with the FCC nearly one month after the "deadline" for such comments to be filed (Pursuant to the Public Notice Release of March 27, 2003), and due to the fact that the Senior Trial Counsel for Plaintiff is out of the country on his annual three-week vacation (and has not had a chance to review the Comments recently filed), the enclosed Motion for Extension is hereby requested.

A copy of the correspondence and its enclosure is also being provided to Margaret Egglar in the Consumer and Governmental Affairs Bureau..

Thank you for your courtesy and assistance in the matter.

Sincerely,

Ginger A. DeGross, Esq.

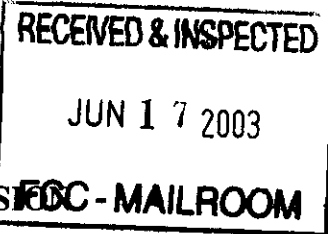
GAD/emd
enclosure

cc: Margaret Egglar ✓

No. of Copies rec'd _____
List ABCDE

EACLTNGTE-MODEMFCCIOSBOR-6-12.03.wpd

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554



In the matter of)
)
LINDA THORPE)
)
Petitioner)
)
vs.)
)
GTE CORPORATION; GTE FLORIDA)
INCORPORATED, AT&T CORP.,)
SPRINT-FLORIDA, INCORPORATED, and)
MCI WORLDCOM NETWORK)
SERVICES, INC.)
)
Respondents.)
_____)

CG DOCKET NO. 03-84

MOTION FOR EXTENSION OF TIME TO FILE
A REPLY TO COMMENTS UNTIMELY FILED

COMES NOW, the Petitioner, Plaintiff in "THORPE vs. GTE", United States District Court for the Middle District of Florida, Case No. 8:00-CV-1231-T-17EAJ, by and through undersigned counsel, and files this Motion for Extension of Time to File A Reply to Comments Untimely Filed and as good grounds for consideration would state:

1. Petitioner originally filed a Petition for Declaratory Ruling with the FCC on or about August 2, 2002.
2. On or about March 27, 2003, the FCC released a Public Notice requesting comments concerning the bundling of local telephone service with long distance service.

3. The Comment Date of 45 days after publication in the Federal Register was on or about May 11, 2003.

4. Based upon the above, the Reply Comment Date of 60 days after publication in the Federal Register would have been May 26, 2003.

5. On or about June 5, 2003, AT&T Corp. filed their Comments with the FCC.

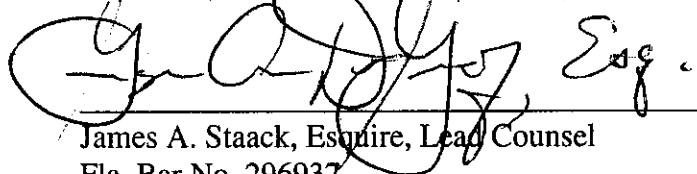
6. On or about June 6, 2003, Cbeyond Communications, LLC, PAC-WEST Telecomm, Inc., and LEC Corp., filed their Comments with the FCC.

7. The Senior Trial Counsel for Plaintiff is on a three-week vacation at this date, and due to the late filing the two above-mentioned Comments, Petitioner is unable to effectively reply to said Comments.

WHEREFORE, Petitioner hereby formally requests an extension to time in which to file a reply to said Comments, on or before July 3, 2003.

Respectfully submitted,

STAACK, SIMMS & HERNANDEZ, P.A.

A large, stylized handwritten signature in black ink, appearing to read 'James A. Staack', is written over a horizontal line.

James A. Staack, Esquire, Lead Counsel
Fla. Bar No. 296937

Ginger A. DeGroff, Esquire, Associate Counsel
Fla. Bar No. 051550

900 Drew Street, Suite #1
Clearwater, FL 33755

Ph: (727) 441-2635

Fax: (727) 461-4836

Trial Counsel for Petitioner/Representative Plaintiffs

Dated: 6/12/03

E:\CLTGTE-MODEM\FCC\EXT-time.reply.wpd
emd